

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MARCIA EGGLESTON, as Administrator of the
Estate of RODNEY GEISER, Deceased c/o
William E. Walker, Jr. Esquire, Attorney at Law,
333 Erie Street South #192, Massillon, Ohio
44646,

Plaintiff,

v.

WAYNE COUNTY, OHIO, *et al.*

CASE NO.: 5:20-cv-02757

JUDGE BENITA Y. PEARSON

MAGISTRATE KATHLEEN B. BURKE

AFFIDAVIT OF TIMOTHY T. RHODES

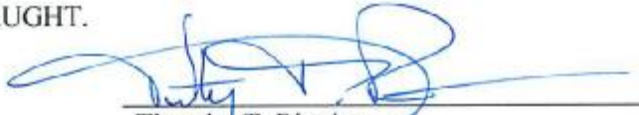
State of Ohio :
 : SS
County of Stark :

Timothy T. Rhodes being first duly sworn according to law, deposes and says:

1. I make this affidavit on the basis of personal knowledge and am competent to testify concerning the matters set forth herein.
2. On or about July 27, 2020 and August 27, 2020 I made public records requests to the Wayne County Sheriff's Office.
3. These public records requests sought Sheriff Office policies, training materials and disciplinary records concerning Sergeant Peters.
4. In the materials I received from the Wayne County Sheriff's Office, I did not find any disciplinary materials concern Sgt. Peters relating the Geiser shooting.
5. In the materials I received from the Wayne County Sheriff's Office, I did not find any training material relating to the Geiser shooting.
6. In the materials I received from the Wayne County Sheriff's Office, I did not find any Sheriff Office policies from 2018 concerning use of force.
7. In the materials I received from the Wayne County Sheriff's Office, I did not find any Sheriff Office policies concerning the handling of mentally ill or emotionally disturbed persons from 2018.
8. In the materials I received from the Wayne County Sheriff's Office, that were in effect in 2018 I found no policies concerning warnings regarding the use of deadly force.
9. I obtained the following recordings: (B) Ptl. Nieman body camera - 1, (C) Ptl Nieman BCI interview, (D) Ptl Nieman Body Camera - 2, (F) Peters body camera, (G) Butler body camera, (H) Rubenstein body camera, (I)Peters BCI interview, (J) Security Camera at Picker Barn on High Street, (K) Hutchinson-Hunter Press Conference.
10. I have submitted herewith true and accurate copies of these recordings.

EXHIBIT A

FURTHER AFFAINT SAYETH NAUGHT.



Timothy T. Rhodes

Sworn to and subscribed to me this 22nd day of March, 2021.



Notary Public



WILLIAM E. WALKER, JR.
ATTORNEY AT LAW
Notary for the State of Ohio.
My commission has no expiration.
Ohio Revised Code Section 147.03.

